

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PULSEDATA, INC.,

*Plaintiff,*

V.

JUNG HOON SON,

*Defendant,*

Civ. No. 1:23-cv-03653-JMF

## DECLARATION OF STEVEN J. PACINI

STEVEN J. PACINI, pursuant to 28 U.S.C. § 1746 declares under penalty of perjury as follows:

1. I am over the age of 18 years old, and reside in Boston, Massachusetts. I am an attorney at Latham & Watkins LLP and serve as counsel for Plaintiff pulseData, Inc. (“pulseData”). I received my Bachelors of Science, *summa cum laude*, from the University of Connecticut and my Juris Doctor, *cum laude*, from the Boston University School of Law. I submit this declaration in support of pulseData’s Motion for Preliminary Injunction. I have personal knowledge of the facts set forth in this declaration and am competent to testify to such facts if called as a witness.

2. On May 16, 2023, I had a call with Thomas G. Pasternak from Akerman LLP regarding this litigation.

3. Pasternak claimed to represent Dr. Jung and requested an extension of time to answer pulseData's complaint.

4. pulseData granted an extension for Dr. Jung to respond to the complaint until June 2, 2023 on the condition that the parties were moving towards the proposed consent judgment

and resolution.

5. I did not hear from Pasternak for two weeks. On June 1, 2023, Pasternak requested another extension and stated that Dr. Jung would answer the complaint.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 30th day of June 2023 in Boston, MA.



Steven J. Pacini  
Latham & Watkins LLP